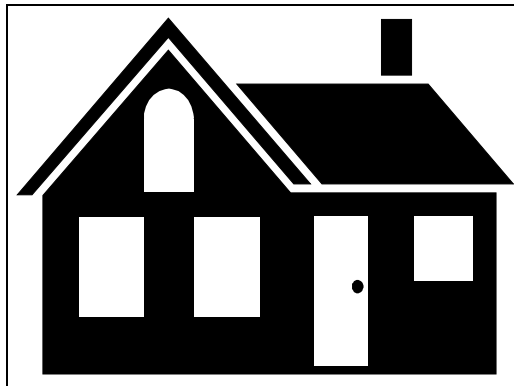


Board of Governors of the Federal Reserve System

Home Mortgage Disclosure Act

Federal Reserve Board, 20th & Constitution Avenue, NW, Stop # 502, Washington, DC 20551 - (202) 452-2016



(PRELIMINARY)

File Specifications For 2004 HMDA data

Federal Deposit Insurance Corporation (FDIC)

National Credit Union Association (NCUA)

Office of the Comptroller of the Currency (OCC)

Office of Thrift Supervision (OTS)

Reporting Changes For 2004 HMDA Files

Introduction

The HMDA file specifications were amended January 23, 2002 to comply with a review of Regulation C that was completed by the Board of Governors of the Federal Reserve System (Board). A final rule was approved on May 2, 2002 that postponed the effective date of the Regulation C amendments from January 1, 2003 to January 1, 2004. Several regulatory changes were made that improve the quality, consistency, and utility of the data reported under HMDA. The amendments require lenders to disclose pricing data on higher cost loans, expand the number of nondepository institutions subject to HMDA's reporting requirements, and revise certain regulatory definitions. As a result of the regulatory changes, items were added to the Transmittal Sheet and Loan Application Register. **BE ADVISED** – the addition of these items affect the Start, End, and Length of columns in the file specifications. The edits were modified accordingly in order to edit these changes and ensure data quality.

Note that the 2004 HMDA file specifications are preliminary. They could change due to transition rules about data collection and reporting that we expect to release in the near future. Please visit the FFIEC web site (www.ffiec.gov) periodically for updated information.

Detailed Information Regarding File Specification Amendments

Transmittal Sheet (included with all submissions)

New Fields

1. Parent Information:

-- Parent Name

-- Parent Address

-- Parent City

-- Parent State

-- Parent Zip Code

All parent information is alpha numeric:

30 bytes in length; input information begins at position 154.

40 bytes in length; input information begins at position 184.

25 bytes in length; input information begins at position 224.

2 bytes in length; input information begins at position 249.

10 bytes in length; input information begins at position 251. Format is 99999 left-justified or 99999-9999.

2. Contact person's e-mail address (include if one exists)

This field is alpha numeric, 45 bytes in length and input of information begins at position 315. Left justify.

With the addition of the new fields to the transmittal sheet, the record length has increased to 380. The order and positions of several fields were changed to more closely mirror the paper copy of the transmittal sheet. For example, the fields for tax ID and total line entries were moved to begin in position 30 and 40, respectively. The contact person name, phone number, and e-mail address are input after parent information in positions 261, 291, 303, and 315, respectively.

Detailed Information Regarding File Specification Amendments (continued)

Loan Application Register (LAR)

New Loan Information Categories

The LAR is included with all submissions. There were new categories added to the LAR as well as changes made to existing categories. The new categories will be listed first followed by the amended fields.

1. Property Type

Contains three property types: One-to-four Family -- other than manufactured housing (code 1); Manufactured Housing (code 2); and Multifamily Dwelling (code 3). The field is numeric, 1 byte in length and selected code is placed in position 60.

Multifamily dwelling was removed from the Purpose Category to this new one. Property Type, follows the Loan Type category on the LAR. Use code 2 to identify all manufactured homes and not code 1 for one-to-four family. Use code 1 for loans on individual condominiums or cooperative units. If you cannot determine (despite reasonable efforts to find out) whether the loan or application relates to a manufactured home, use code 1.

2. Preapprovals

Information as to whether an application is a preapproval request was added as a new field. The preapprovals category is reported on home purchase loans only. The category consists of three codes: Preapproval was requested (code 1); Preapproval was not requested (2); and Not applicable (code 3). 'Not applicable' code 3 would be used for applications or loans for home improvement, refinancing, and for purchased loans. The field is numeric, 1 byte in length, and selected information is input in position 68.

3. Ethnicity

Ethnicity was added as a separate information category from race. Codes are as follows: Hispanic or Latino (code 1); Not Hispanic or Latino (code 2); Information not provided by applicant in mail, Internet or telephone application (code 3); Not applicable (code 4); and No co-applicant (code 5). There is a field for the applicant and one for the co-applicant and both must be completed for each LAR record. 'Not applicable' code 4 would be used for loans purchased by the institution or when the applicant or co-applicant is a corporation or partnership. Each field is numeric, 1 byte in length and selected code is placed in position 95 (for applicant) and 96 (for co-applicant).

4. Rate Spread

The rate spread is the spread between the annual percentage rate (APR) on a loan and the rate on Treasury securities with comparable maturity periods, for loan originations in which the APR exceeds the applicable rate by a percentage specified by the Board. The reporting requirement applies to originations of home purchase loans, dwelling-secured home improvement loans, and refinancings.

Detailed Information Regarding File Specification Amendments (continued)

Loan Application Register (LAR)

4. Rate Spread (continued)

5. Home Ownership and Equity Protection Act (HOEPA) Status

6. Lien Status

New Loan Information Categories (Continued)

The rate spread is entered to two decimal places. Include the decimal point and any leading or trailing zeros. If the difference between APR and the Treasury yield is a figure with more than two decimal places, round the figure or truncate the digits beyond two decimal places.

Enter 'NA' if the loan is not subject to Regulation Z, or involves a home improvement loan that is not dwelling-secured, or involves a loan that you purchased. Also enter 'NA' if an application does not result in a loan application. And, if the difference between the APR and the Treasury yield is less than 3 percentage points for first-lien loans and 5 percentage points for subordinate-lien loans, enter 'NA'.

The field is alpha numeric. It is 5 bytes in length and begins in position 117. Format is 99.99 (or NA left-justified). If rate spread exceeds 99.99 fill the spaces with 99.99.

HOEPA applies only to loans originated or purchased. Code 1 identifies a HOEPA loan. Code 2 identifies an originated or purchased loan that is not subject to the requirements of HOEPA and all other loans where action taken is not originated or purchased. The field is numeric, never blank, one byte in length and is reported in position 122.

Lien status is reported for applications and originated loans. Purchased loans are excluded from reporting lien status. Codes are as follows: Secured by a first lien on a dwelling (code 1); Secured by a subordinate lien on a dwelling (code 2); Not secured by a lien on a dwelling (code 3); and Not applicable -- purchased loan (code 4). This field is never left blank. The 'not applicable' code 4 would be used on loans purchased by the institution. The field is numeric. It is one byte in length and is reported in position 123.

Detailed Information Regarding File Specification Amendments (continued)

Loan Application Register (LAR)

Amendments to Existing Categories

1. Loan Purpose

The loan purpose category now contains three codes: Home Purchase (code 1); Home Improvement (code 2); and Refinancing (Code 3). The field is numeric, 1 byte in length and selected code is placed in position 61.

2. Action Taken

Two options were added to existing ones to reflect a Preapproval request denied by financial institution (code 7) and Preapproval request approved but not accepted (code 8). The approved but not accepted requests are optional reporting. The field is numeric, 1 byte in length and selected code is placed in position 69.

3. Applicant and Co-applicant Race Categories

Race codes are as follows:
American Indian or Alaska Native (code 1);
Asian (code 2); Black or African American (code 3); Native Hawaiian or Other Pacific Islander (code 4); and White (code 5).

Code 6 indicates 'Information not Provided by Applicant in Mail, Internet, or Telephone Application' selection and code 7 is 'Not Applicable.' The 'Other' race selection was removed. A 'No co-applicant' option (code 8) was added for cases when there is no co-applicant or co-borrower. At least one code selection must be made in the applicant and co-applicant race categories. However, since an applicant and a co-applicant may select more than one race designation on an application and the institution is to report all the codes corresponding to the applicant and co-applicant's selections, an application or loan could contain codes 1 through 5 for each individual.

If an APPLICANT makes more than one race designation, the first designation is reported in position 97; the second one in position 98; the third race designation in position 99; the fourth one is reported in position 100; and the fifth designation is reported in position 101. Position 97 (Applicant Race: 1) cannot be blank because if only one code applies, that response is placed in position 97; the remaining applicant race positions are blank. Therefore, the applicant race: 1 field is numeric because it can never be blank. The remaining four applicant fields are alpha numeric.

If a CO-APPLICANT makes more than one race designation, the first designation is reported in position 102; the second one in position 103; the third race designation in position 104; the fourth one is reported in position 105; the fifth designation is reported in position 106. Position 102 (Co-Applicant Race: 1) cannot ever be blank because if only one code applies, that response is placed in position 102; the remaining co-applicant race positions are blank. Thus, the co-applicant race: 1 field is numeric because it can never be blank. The remaining four co-applicant fields are alpha numeric.

4. Applicant and Co-applicant Sex Categories

A 'No co-applicant' selection was added for cases when there is no co-applicant or co-borrower (code 5). The fields are numeric, each 1 byte in length, and the selected code is placed in position 107 for applicant and 108 for co-applicant.

Detailed Information Regarding File Specification Amendments (continued)

Loan Application Register (LAR)

Amendments to Existing Categories (continued)

5. Metropolitan Area Category

The number of bytes in this field was increased by one. The field is alphanumeric, 5 bytes in length, and the selected FIPS code with leading zeros or NA left-justified begins in position 78.

6. Type of Purchaser Category

Some of the institution types reflected in the various purchaser type codes were changed to identify the type of purchaser of an originated or purchased loan. Existing categories -- commercial bank, savings bank or savings association -- were combined (code 6). Code 7 was expanded to encompass life insurance company, credit union, mortgage bank, or finance company. A new category 'private securitization' was added as code 5. The field is numeric, 1 byte in length, and selected information is placed in position 113.

File Specifications For 2004 HMDA Data

Introduction

The following information describes the format used when sending automated HMDA data to the Board of Governors of the Federal Reserve System. These formats should only be used to send data to the Board if you are a FDIC, NCUA, OCC or OTS reporter.

General Information For PC Diskette, CD-ROM and Cartridge Tape

All records are 380 characters in length and contain the following:

- The Transmittal Sheet has 22 elements comprising 359 characters and filler comprising 21 characters of blanks.
- The Loan/Application Register has 41 elements comprising 123 characters and filler comprising 257 characters of blanks.

PC Diskette and CD-ROM Format Information

PC Diskette and CD-ROM Format Characteristics

HMDA data submitted via diskette or CD-ROM must adhere to the following specifications:

1. The diskette or CD-ROM must be formatted for IBM compatible personal computers. The following diskette and CD-ROM formats will be accepted:
 - 3-1/2 high density, 1.44M formatted capacity
 - CD-R or equivalent recordable compact disc
2. The HMDA data should be contained in a file named: HMDA.DAT
 - The file must be the only file on the diskette or CD-ROM.
 - The file may contain HMDA records for multiple respondents that must be sorted in Respondent-ID, Record Type order.
 - If a HMDA file will not fit on one diskette, it must be split into multiple files (each named HMDA.DAT) using separate diskettes or CD-ROMs. The HMDA Transmittal Sheet should only be included on the first diskette or CD-ROM.
3. The HMDA data file must be in ASCII format, containing carriage return/line feed (0D0A in HEX) characters at the end of each record. There should not be an end-of-file mark on the file.
4. The record format is fixed; the fields contained in the record must not be delimited. In addition, the record must not be enclosed in quotes.
5. Numeric fields on HMDA records must be right justified and zero filled. If you are using a product that drops the leading zeros on numeric fields, the data will not pass validity edits.
6. The PC diskette(s) or CD-ROM should be labeled with information containing the Reporter's name, identification number, agency code, processing year, contact name, phone number, number of diskettes or CD-ROMs (e.g., 1 of 3), number of LAR records, and any other pertinent information.
7. All diskettes or CD-ROMs submitted should be virus-free.
8. The diskette and CD-ROM will contain two types of records:

1 = Transmittal Sheet
2 = LAR Register Data
9. No zip file(s) will be accepted.
10. There should not be any null values (00 in HEX or ASCII char (0)) contained in the file.

Internet Email and File Encryption Information

Instructions for Internet Email submission and File Encryption

The following information describes the procedures for a successful HMDA Internet submission via Internet Email. Also included are the procedures for encrypting your HMDA submission if the file is generated outside of the HMDA FFIEC Data Entry Software.

Internet Email

- Download a free copy of the HMDA Data Entry Software at www.ffiec.gov/hmda.
- After successful installation of the software, open the software. Initial access into the software will require a Transmittal Sheet to be completed in its entirety.
- Following the completion of the submission, perform a Batch Edit prior to Exporting the data. If errors are detected, print an Error Report to identify the loan/application records in error and correct the erroneous data. HMDA data containing errors cannot be exported to a regulator via email.
- Once the submission is error free, choose the Export option from the Front Page. A message will appear titled "Did you know?", click "Close".
- For export options, choose the second option, "To Regulatory Agency Via Internet Email" and click "OK".
- Located in the center is the file path indicating the file that will be attached to the email submission. **The file path is: C:\HMDAW\int\hmdaencr.enc.** Confirm the current year submission and choose "Begin".
- A warning message will appear containing pertinent submission contact information. If this information is correct, choose "Continue". If the information is incorrect, choose "Cancel" and correct the information.
- The Export Status will create the exported file to the path stated above. A message box, titled "HMDA-Prepare for Internet Submission" will appear. **PRINT this message.** The message contains further instructions as well as the email address for your submission. "Close" the box. You have successfully created the **HMDAENCR.ENC** file for Internet submission.
- Address the email for submission with the correct email address stated in the printed message above. Note: The email address is agency specific. Be sure to send your submission to the email address for your Institution's regulatory agency.

In the subject line of the email type the following information:

- Respondent ID
- Agency Code
- Initial Submission or Complete Resubmission

In the body of the email type the following information:

- Institution Name
- Contact Name
- Contact Phone
- # of LAR being submitted

ATTACH the following file to the email: C:\HMDAW\int\hmdaencr.enc and send the file.

- You will receive an automatic response to confirm receipt of your file within 48 hours. Save this email for future reference. If you do not receive a response within 48 hours, contact **hmdahelp@frb.gov** or the HMDA Assistance Line at **202-452-2016**. All inquiries regarding HMDA should include the following information:
 - Respondent ID
 - Agency Code
 - Institution Name
 - Contact Name and Phone and/or Email

File Encryption

- Institutions utilizing other vendor's software for HMDA reporting can still take advantage of the Internet Email option.
 - After successful download of the HMDA Data Entry Software from the FFIEC HMDA website at www.ffiec.gov/hmda, you must install the FFIEC HMDA Internet Submission encryption component.
 - Click on the HMDAinstall.exe.
 - You will receive a Welcome screen, click "Next".
 - Select Destination Directory. C:\HMDAW, click "Next".
 - Click ONLY the "Internet Submission Software" (You must deselect the other four options), click "Next".
 - Ready to Install.
 - Installation Completed.
 - After successful installation of the encryption component, Click on "Start", "Programs", "HMDA", "Internet Submission Software". A warning message will appear to inform you that this software does not connect to the internet. Click "OK" to continue.
 - Next you will need to locate your HMDA data file for encryption. If you are using a software package other than the FFIEC Data Entry Software, your data file may be named something other than HMDA.DAT. Please refer to your vendor documentation to determine the name and file location of your HMDA data file.
 - Click the "Begin Process" button to start the encryption process. Once the process is completed, a new file named **HMDAENCR.ENC** will be created. **The file path is: C:\HMDAW\int\hmdaencr.enc.** A message box, titled "HMDA-Prepare for Internet Submission" will appear. **PRINT this message.** The message contains further instructions as well as the email address for your submission. "Close" the box. You have successfully created the **HMDAENCR.ENC** file for Internet submission.
- Address the email for submission with the correct email address stated in the printed message above. Note: The email address is agency specific. Be sure to send your submission to the email address for your Institution's regulatory agency.

In the subject line of the email type the following information:

- Respondent ID
- Agency Code
- Initial Submission or Complete Resubmission

In the body of the email type the following information:

- Institution Name
- Contact Name
- Contact Phone
- # of LAR being submitted

ATTACH the following file to the email: C:\HMDAW\int\hmdaencr.enc and send the file.

- You will receive an automatic response to confirm receipt of your file within 48 hours. Save this email for future reference. If you do not receive a response within 48 hours, contact **hmdahelp@frb.gov** or the HMDA Assistance Line at **202-452-2016**. All inquiries regarding HMDA should include the following information:
 - Respondent ID
 - Agency Code
 - Institution Name
 - Contact Name and Phone and/or Email

Cartridge Tape Format Information

Cartridge Tape Format Characteristics

HMDA data submitted via Cartridge Tape must adhere to the following specifications:

1. Tape Label: All Tapes MUST be non-labeled
2. Record Format: Fixed Block
3. Blocksize: 29,260
4. Record Length: 380
5. File Organization: Physical Sequential
6. Tape Density: 3480, 3490, or 3490E IBM Compatible Cartridges - non-compressed.
(No other type will be accepted.)
7. Data Format: EBCDIC
8. The tape will contain three types of records in one file:
 - 0 = File Identifier
 - 1 = Transmittal Sheet
 - 2 = LAR Register Data
9. End of file marker should be included
10. A tape should be accompanied with a document containing the respondent's name identification number and agency code; record length; block size; contact name; phone number; number of LAR records; and any other pertinent information.
11. There should not be any null values (00 in HEX or ASCII char (0)) contained in the file.

File Identifier

(INCLUDE THE FILE IDENTIFIER WITH CARTRIDGE TAPE SUBMISSIONS ONLY)

The Start, End, and Length columns are in BYTES. The Data Type should be alphanumeric "AN" or numeric "N". Numeric "N" fields are unpacked, unsigned, and right-justified.

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
01. Record ID	1	1	1	N	Value is 0
02. Filler	2	15	14	AN	Blank
03. Source ID	16	16	1	N	Values are 1=OCC, 3=FDIC, OTS=4, or 5=NCUA
04. Filler	17	23	7	AN	Blank
05. Transmission Timestamp	24	35	12	N	Format is century, year, month, day, hour, minute (e.g., Jan. 17, 2005, at 1:30 p.m. would be 200501171330)
06. Filler	36	45	10	AN	Blank
07. Series ID	46	49	4	AN	Four character acronym = HMDA
08. Filler	50	50	1	AN	Blank
09. File Status	51	51	1	AN	P = Production; T = Test
10. Filler	52	63	12	AN	Blank
11. Activity Year	64	67	4	N	Four digit year (e.g., 2004)
12. Filler	68	380	313	AN	Blank

Transmittal Sheet

The Start, End, and Length columns are in BYTES. The Data Type is alphanumeric "AN" or numeric "N". Numeric "N" fields are unpacked, unsigned, and right-justified.

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
01. Record ID	1	1	1	N	Value is 1
02. Respondent-ID	2	11	10	AN	Assigned by your federal regulatory agency. Should be right-justified and zero filled.
03. Agency Code	12	12	1	N	Values are 1=OCC, 3=FDIC, 4=OTS, or 5=NCUA
04. Timestamp	13	24	12	N	Format is century, year, month, day, hour, minute (e.g., Jan. 17, 2005, at 1:30 pm would be 200501171330)
05. Transaction Code	25	25	1	N	Values are 1=Delete, 2=Add, or 3 = Revise
06. Activity Year	26	29	4	N	Four digit year (e.g., 2004)
07. Tax ID	30	39	10	AN	Format is 99-99999999
08. Total Line Entries	40	46	7	N	The number of line entries contained in the accompanying Loan Application Register
09. Respondent Name	47	76	30	AN	Left-justified and upper case
10. Respondent Address	77	116	40	AN	Left-justified
11. Respondent City	117	141	25	AN	Left-justified
12. Respondent State	142	143	2	AN	Postal Code abbreviation
13. Respondent Zip Code	144	153	10	AN	Format is 99999 left-justified or 99999-9999
14. Parent Name	154	183	30	AN	If applicable
15. Parent Address	184	223	40	AN	If applicable
16. Parent City	224	248	25	AN	If applicable
17. Parent State	249	250	2	AN	If applicable
18. Parent Zip Code	251	260	10	AN	If applicable; format is 99999 left-justified or 99999-9999
19. Contact Person's Name	261	290	30	AN	For report questions
20. Contact Person's Phone Number	291	302	12	AN	Format is 999-999-9999

Transmittal Sheet (Cont'd)

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
21. Contact Person's Facsimile Number	303	314	12	AN	Format is 999-999-9999
22. Contact Person's E-mail Address	315	359	45	AN	Enter if one exists. Left-justified.
23. Filler	360	380*	21	AN	Blank

*CRLF (0D0A)

Carriage Return/Line Feed for PC diskette or
CD-ROM reporting only

Loan/Application Register

The Start, End, and Length columns are in BYTES. The Data Type is alphanumeric "AN" or numeric "N." Numeric N fields are unpacked, unsigned, and right-justified.

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
01. Record ID	1	1	1	N	Value is 2
02. Respondent-ID	2	11	10	AN	Assigned by your federal regulatory agency. Should be right-justified and zero filled.
03. Agency Code	12	12	1	N	Values are 1=OCC, 3=FDIC, 4=OTS, or 5=NCUA
04. Timestamp	13	24	12	N	Format is century, year, month, day, hour, minute (e.g., Jan. 17, 2005, at 1:30 pm would be 200501171330)
05. Transaction Code	25	25	1	N	Values are 1=Delete, 2=Add, or 3=Revise
06. Loan/Application Number	26	50	25	AN	Unique identifier across the home office and branch sites
07. Date Application Received	51	58	8	AN	Format is ccyyymmdd or NA left-justified
08. Loan Type	59	59	1	N	Values are 1, 2, 3, or 4
09. Property Type	60	60	1	N	Values are 1, 2, or 3
10. Loan Purpose	61	61	1	N	Values are 1, 2, or 3
11. Owner Occupancy	62	62	1	N	Values are 1, 2, or 3
12. Loan Amount	63	67	5	N	Report in thousands, round to the nearest thousand with leading zeros and without commas
13. Preapprovals	68	68	1	N	Values are 1, 2, or 3.
14. Type of Action Taken	69	69	1	N	Values are 1, 2, 3, 4, 5, 6, 7, or 8
15. Date of Action	70	77	8	N	Format is ccyyymmdd
16. Metropolitan Area	78	82	5	AN	FIPS code with leading zeros or NA left-justified
17. State Code	83	84	2	AN	FIPS code with leading zeros or NA left-justified
18. County Code	85	87	3	AN	FIPS code with leading zeros or NA left-justified
19. Census Tract	88	94	7	AN	Include decimal point and any leading or trailing zeros or NA left-justified

Loan/Application Register (Cont'd)

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
20. Ethnicity Applicant	95	95	1	N	Values are 1, 2, 3, or 4
21. Ethnicity Co-applicant	96	96	1	N	Values are 1, 2, 3, 4, or 5
22. Applicant Race: 1	97	97	1	N	Values are 1, 2, 3, 4, 5, 6, or 7
23. Applicant Race: 2	98	98	1	AN	Values are 1, 2, 3, 4, 5, or blank
24. Applicant Race: 3	99	99	1	AN	Values are 1, 2, 3, 4, 5, or blank
25. Applicant Race: 4	100	100	1	AN	Values are 1, 2, 3, 4, 5, or blank
26. Applicant Race: 5	101	101	1	AN	Values are 1, 2, 3, 4, 5, or blank
27. Co-applicant Race: 1	102	102	1	N	Values are 1, 2, 3, 4, 5, 6, 7, or 8
28. Co-applicant Race: 2	103	103	1	AN	Values are 1, 2, 3, 4, 5, or blank
29. Co-applicant Race: 3	104	104	1	AN	Values are 1, 2, 3, 4, 5, or blank
30. Co-applicant Race: 4	105	105	1	AN	Values are 1, 2, 3, 4, 5, or blank
31. Co-applicant Race: 5	106	106	1	AN	Values are 1, 2, 3, 4, 5, or blank
32. Applicant Sex	107	107	1	N	Values are 1, 2, 3, or 4
33. Co-applicant Sex	108	108	1	N	Values are 1, 2, 3, 4, or 5
34. Applicant Income	109	112	4	AN	Report in thousands, round to the nearest thousand with leading zeros and without commas or NA left-justified
35. Type of Purchaser	113	113	1	N	Values are 0, 1, 2, 3, 4, 5, 6, 7, 8, or 9
36. Denial Reason: 1	114	114	1	AN	Values are 1, 2, 3, 4, 5, 6, 7, 8, 9, or blank
37. Denial Reason: 2	115	115	1	AN	Values are 1, 2, 3, 4, 5, 6, 7, 8, 9, or blank
38. Denial Reason: 3	116	116	1	AN	Values are 1, 2, 3, 4, 5, 6, 7, 8, 9, or blank
39. Rate Spread	117	121	5	AN	Enter the rate spread to two decimal places. Include the decimal point and any leading or trailing zeros or NA left-justified
40. HOEPA Status	122	122	1	N	Values are 1 or 2

Loan/Application Register (Cont'd)

Element Label	Start	End	Length	Data Type	Comments, Values, Keys, etc.
41. Lien Status	123	123	1	N	Values are 1, 2, 3, or 4
42. Filler	124	380*	257	AN	Blank

*CRLF (0D0A) Carriage Return/Line Feed for PC diskette or CD-ROM reporting only